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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

10 Mi Familia Vota, et al.,
11 Plaintiffs,
12 v.
13 Adrian Fontes, et al.,
14 Defendants.

Case No. 2:22-cv-00509-SRB
(Lead)

**STIPULATED JOINT MOTION FOR
ENTRY OF A PROTECTIVE
ORDER**

(Before the Hon. Susan R. Bolton)

16 | AND CONSOLIDATED CASES.

No. CV-22-00519-PHX-SRB
No. CV-22-01003-PHX-SRB
No. CV-22-01124-PHX-SRB
No. CV-22-01369-PHX-SRB
No. CV-22-01381-PHX-SRB
No. CV-22-01602-PHX-SRB
No. CV-22-01901-PHX-SRB

22 Pursuant to Fed. R. Civ. P. 26(c), the parties hereby jointly move the Court to enter
23 the proposed protective order (the “Protective Order”), which is lodged herewith, to govern
24 the disclosure and use of information obtained in this case, based on the following grounds:

25 1. Documents and information defined as "Materials" in the Protective Order being
26 sought through discovery in the above-captioned action are considered confidential under
27 A.R.S. § 16-168 or 52 U.S.C.A. § 20507. The parties have agreed to be bound by the terms

1 of the Protective Order in this action to facilitate document production and disclosure, and
2 to protect the respective interests of the parties in protecting confidential information. The
3 Protective Order shall remain in effect unless modified pursuant to the terms contained in
4 the Protective Order.

5 2. Entry of the Protective Order will expedite the flow of discovery material, facilitate
6 the prompt resolution of any disputes over privilege and confidentiality, adequately protect
7 the material claimed to be privileged or proprietary, and ensure that protection is afforded
8 to material so designated.

9 3. The procedures set forth in the Protective Order permit the parties to designate
10 documents as either “Confidential Information Not To Be Disclosed” or “Confidential Voter
11 Registration Information” only when they have a good faith basis that such documents or
12 information would be subject to a legitimate protection. The type of information addressed
13 in the Protective Order is the type of information to which such protections may apply.

14 There is good cause for entry of the proposed protective order because the voter
15 registration records contain information kept confidential by Arizona law, as well as
16 sensitive information that should be revealed only in the specific manner and to the specific
17 parties designated by the proposed Protective Order. *See Fed. R. Civ. P. 26(c); A.R.S. § 16-*
18 *168; 52 U.S.C.A. § 20507; see also Kamakana v. City and Cty. Of Honolulu, 447 F.3d 1172,*
19 *1180 (9th Cir. 2006) (court may balance and protect interest of private parties in issuing*
20 *discovery orders).*

21 For the foregoing reasons, the undersigned parties respectfully request that the
22 Court grant this Stipulated Joint Motion for Entry of a Protective Order and enter the
23 Protective Order as lodged.

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RESPECTFULLY SUBMITTED: April 12, 2023.

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CERTIFICATE OF SERVICE

12 I hereby certify that on April 12, 2023, I caused a true and correct copy of the foregoing
13 document, to be filed with Clerk of the Court of the United States District Court for the District
14 of Arizona using the CM/ECF filing system. Counsel for all parties who have appeared will be
15 served by the CM/ECF system pursuant to the notice of electronic filing.

/s/ *Ella Meshke*